

## **REMARKS**

Applicant appreciates the thorough review and suggestions for overcoming the informality objections. The Examiner rejected claims 1-29 as being unpatentable under the provisions of both 35 U.S.C. § 102 and 35 U.S.C. § 103. The Examiner cited U.S. Patent No. 5,159,891, issued to Lohr (hereinafter "the Lohr patent" or "Lohr") as anticipating claims 1-5 and 7-11. The Examiner also cited European Patent Application 357,269, listing Karsan as the inventor (hereinafter "the Karsan application" or "Karsan") as anticipating claims 1, 6, 7 and 12. The Examiner also cited U.S. Patent No. 4,913,238, issued to Danazcko (hereinafter "the Danazcko patent" or "Danazcko") as anticipating claims 13 and 25. In rejecting the remaining claims as being obvious under the provisions of 35 U.S.C. § 103, the Examiner relied on Danazcko in light of a various combinations of U.S. Patent No. 3,580,207, issued to Pangalila (hereinafter "the Pangalila patent" or "Pangalila"), U.S. Patent No. 3,837,309, issued to Biewer (hereinafter "the Biewer patent" or "Biewer"), and U.S. Patent No. 4,352,599, issued to Goldsmith (hereinafter "the Goldsmith patent" or "Goldsmith").

Applicant cancelled claims 1-29. Applicant also added new claims 31-46, which Applicant respectfully submits are allowable over the cited prior art when viewed alone and in combination. Claims 31, 36, and 40 are new independent claims pertaining to the Applicant's method of deploying or installing a tension-anchored platform. In each of new independent claims 31, 36, and 40, the platform is positioned at a position that is "laterally offset" from the lateral position for connecting to tendons associated with a desired location of a subsea well. Each of the methods include using the mooring lines to move the platform laterally above the subsea location for the desired subsea well prior to connecting the tendons anchored to the seabed to the platform. Claim 40, particularly discusses moving the platform with the mooring lines over distances to another location for another subsea well when the distance to be traveled

is not achievable with the platform still anchored with the tendons to the seabed around the first location of the first subsea well.

The cited prior art does not disclose or suggest the features of new claims 31-46 because, for example, none of the cited references disclose or suggest "positioning a platform at a position that is laterally offset from a desired subsea location for a subsea well" and "moving the platform laterally to a position above the desired subsea location of the subsea well by selectively tightening and loosening the plurality of the mooring lines" (Claims 31 and 36) or similar steps for more than one well (Claim 40). Danazcko discloses that the platform is towed into position above the anchoring site, and only discloses using the mooring lines 10 to hold the platform 2 "in place." *See* the Danazcko patent (Col. 8: ll. 13-15, Col. 4: ll. 10-11, and Figures 7A-7E). The cited art must disclose or suggest each and every limitation, by a preponderance of the evidence, in order to reject a claim under the provisions of 35 U.S.C. §§ 102 and 103. *See* MPEP 706.02, and MPEP 706. Danazcko does not affirmatively disclose or suggest positioning the platform laterally offset from the desired subsea location and then using the mooring lines to move the platform over the desired subsea location. Accordingly, Applicant respectfully submits that claims 31-46 are patentable over Danazcko.

Lohr discloses that there can be a plurality of subsea wells or drill sites 20 under the platform 10, and that the mooring or anchor lines can be used to move the platform 10 so that a centrally located derrick 16 is directly above the desired drill site 20. *See* the Lohr patent (Col. 3: ll. 11-23, and Figures 1 and 4). However, Lohr discloses that this is possible because the previously connected tendons 14 are flexible enough, due to their length, for the platform 10 to move laterally through winching of the anchor lines. *See* the Lohr patent (Col. 3: ll. 16-23, and Figures 1 and 4). Therefore, the adjustments discussed in Lohr are after the tendons 14 are

connected to the platform 10. Lohr does not disclose or suggest that the anchor lines would be used to move to the platform 10 without the tendons 14 being connected. Lohr also does not teach or suggest positioning the platform laterally offset from the desired subsea location and then using the mooring lines to move the platform over the desired subsea location before connecting the tendons. The teachings in Lohr pertain to the flexibility of Lohr's assembly with the tendons 14 connected. In fact, the reason provided for the ability to move Lohr's platform even suggests a desire to reposition the platform with the tendons 14 connected rather than disconnecting them. Applicant respectfully submits that Lohr does anticipate or suggest each and every claim limitation by a preponderance of the evidence, either alone or in combination with Danazcko. Accordingly, Applicant respectfully submits that claims 31-46 are patentable over Lohr.

The other cited references also do not disclose or suggest "positioning a platform at a position that is laterally offset from a desired subsea location for a subsea well" and "moving the platform laterally to a position above the desired subsea location of the subsea well by selectively tightening and loosening the plurality of the mooring lines" before connecting the platform to tendons (Claims 31 and 36) or similar steps for more than one well (Claim 40). For example, Biewer discloses a buoy platform that does not use tendons rather than a tension leg platform using tendons. *See generally* the Biewer patent. There is no mention of using mooring or anchor lines for moving the vessel in Biewer.

Goldsmith does not disclose using lateral mooring lines at all. Instead, Goldsmith temporarily connects the platform 10 to seabed with temporary mooring lines 18. Goldsmith discloses that the platform 10 arrives after all the temporary mooring lines 18 are preinstalled. *See* the Goldsmith patent (Col. 4: ll. 61-68, and Figures 1 and 4). Then, the platform is

positioned "sufficiently close to a position directly above anchor means 20" for retrieving and connecting pendant lines 40 and temporary anchor lines 18. *See* the Goldsmith patent (Col. 5: ll. 1-46, and Figures 1 and 4). Goldsmith does not disclose using the temporary mooring lines 40 to move the platform 10.

After tensioning the temporary mooring lines 18, Goldsmith discloses that the permanent tethering elements 30 (tendons) need to be attached. Goldsmith discloses that the tethering elements 30 can be moved to a position directly above the guide funnel of the anchor by "either maneuvering the tension leg platform 10 by a applying a lateral forces thereto with one or more tug boats, or by rotating the tethering element 30 until a thrusting means 130 thereof is properly directed for moving the lower end 118" of tethering element toward the funnel. *See* the Goldsmith patent (Col. 10: ll. 15-25). Goldsmith discloses that the thrusting means 130 is "merely a radially directed orifice" through which fluid is pumped, creating a jet of fluid, to thrust the end 118 of the tethering element 30. *See* the Goldsmith patent (Col. 8: ll. 26-34, and Figures 11). Thus, even when faced with needing to align the tethering elements, Goldsmith did not move the platform with the mooring lines into position for connecting the tendons. Goldsmith chose to use a tug boat or a thrust means at the end of the tethering element. When presented with a problem of aligning the tethering elements or tendons, Goldsmith did not move the platform by adjusting the mooring lines. Accordingly, Goldsmith is actually evidence that using mooring lines as Applicant has claimed is not obvious to those skilled under the provisions of 35 U.S.C. 103.

Pangalila discloses a system for "sensing, comparing, and regulating the tension" in each of a plurality of cables. *See* the Pangalila patent (Col. 1: ll. 61-63). The entirety of Pangalila pertains to adjusting the mooring lines in response to tension and lack of tension in the various

mooring lines of an installed platform. *See generally* the Goldsmith patent. Nothing in the Pangalila patent discloses or suggests using the mooring lines to move the platform during deployment and prior to connection to the tendons. Similarly, Karsan discloses using directable propeller 54 to maintain the Karsan platform 20 "in a fixed position" relative to the ocean floor in response to wind, current, and waves. *See* the Karsan application (Col. 6: ll. 15-21, Figure 1). Karsan's use of mooring lines is part of a "spring-buoy" system for stabilizing the platform. *See* the Karsan application (Col. 6: ll. 1-15, Figure 1). Nothing in the Karsan application pertains to moving the platform with the mooring lines like that in the Applicant's claims. The cited art must disclose or suggest each and every limitation, by a preponderance of the evidence, in order to reject a claim under the provisions of 35 U.S.C. §§ 102 and 103. *See* MPEP 706.02, and MPEP 706. Applicant respectfully submits that neither Biewer, Goldsmith, Karsan nor Pangalila anticipates or suggests each and every claim limitation by a preponderance of the evidence, either alone or in combination with each other, or with Lohr and Danazcko. Accordingly, Applicant respectfully submits that claims 31-46 are patentable over Biewer, Goldsmith, Karsan, and Pangalila.

Moreover, with respect to claim 40, none of the cited references disclose or suggest "disconnecting the platform from the tendons associated with the first desired subsea location of the first subsea well" and "moving the platform laterally a distance that is greater than the distance the platform can laterally move while being connected to the tendons associated with the first desired position of the first subsea well, to a second position above a second desired subsea location of a second subsea well." Because none of the cited references teach or suggest disconnecting the tendons associated with a first subsea well and moving the platform with the

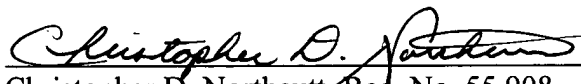
mooring lines to another subsea well locations. Applicant respectfully submits that claims 40-46 are patentable over the cited prior art.

### CONCLUSION

Applicant respectfully submits that claims 31-46 are all in condition for allowance. Reconsideration of the application and allowance of all claims are respectfully requested, and Applicant respectfully requests the issuance of a Notice of Allowance.

Respectfully submitted,

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